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Attorneys for Defendants
OPENFEINT, INC. and
GREE INTERNATIONAL, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MATTHEW HINES, JENNIFER AGUIRRE,
ALEXANDER HERNANDEZ, Individuals, on
Behalf of Themselves and Others Similarly
Situating,

Plaintiffs,

v.

OPENFEINT, INC., a Delaware Corporation,
GREE INTERNATIONAL, INC., a California
Corporation;

Defendants.

CASE NO. 3:11-cv-03084 EMC

**STIPULATION AND PROPOSED ORDER
TO SET DEADLINE FOR FILING OF
AMENDED COMPLAINT AND BRIEFING
SCHEDULE AND HEARING FOR
PROSPECTIVE MOTION TO DISMISS**

Jury Trial Demanded

Date Action Filed: June 22, 2011
Trial Date: Not Set

WHEREAS, on June 22, 2011, Plaintiffs Matthew Hines, Jennifer Aguirre, and Alexander Hernandez ("Plaintiffs") filed their Class Action Complaint in this matter;

WHEREAS, Defendants OpenFeint, Inc. ("OpenFeint") and GREE International, Inc. ("GREE") (collectively, "Defendants") and Plaintiffs subsequently stipulated, pursuant to Civil Local

Rule 6-1, and this Court ordered, that Defendants' time to answer or otherwise response to the Class Action Complaint was extended to August 31, 2011 (Docket No. 12);

WHEREAS, Plaintiffs intend to file an amended complaint pursuant to Fed. R. Civ. P. 15(a)(1) on or before September 6, 2011;

WHEREAS, the parties wish to set a schedule for the filing of the amended complaint, Defendants' time to answer or otherwise respond to the amended complaint, and a briefing schedule in the event Defendants move to dismiss the amended complaint;

NOW, THEREFORE, the parties hereby stipulate and request entry of an order as follows:

1. Plaintiffs shall file their amended complaint on or before September 6, 2011;
2. Defendants shall move to dismiss or otherwise respond to or answer the amended complaint no later than October 11, 2011;
3. Plaintiffs shall oppose Defendants' motion to dismiss, if any, no later than November 15, 2011;
4. Defendants shall reply to Plaintiffs' opposition to the motion to dismiss no later than December 6, 2011; and
5. The Court shall conduct a hearing on Defendants' motion to dismiss on Friday, ~~January 13, 2012, at 1:30 p.m.~~ January 20, 2012 at 1:30 p.m.

The above-referenced deadlines will not alter the date of any event or deadline already fixed by Court order.

Respectfully submitted,

DATED: August 29, 2011

GIBSON, DUNN & CRUTCHER LLP

By: /s/ S. Ashlie Beringer
S. Ashlie Beringer

Attorneys for Defendants
OPENFEINT, INC. and
GREE INTERNATIONAL, INC.

[Signatures continued on page 3.]

DATED: August 29, 2011

MILBERG LLP

By: /s/ Peter E. Seidman
Peter E. Seidman

Attorneys for Plaintiffs
MATTHEW HINES, ET AL.

ATTORNEY ATTESTATION

Pursuant to General Order 45, I, S. Ashlie Beringer, hereby attest that concurrence in the filing of this document has been obtained from Peter E. Seidman.

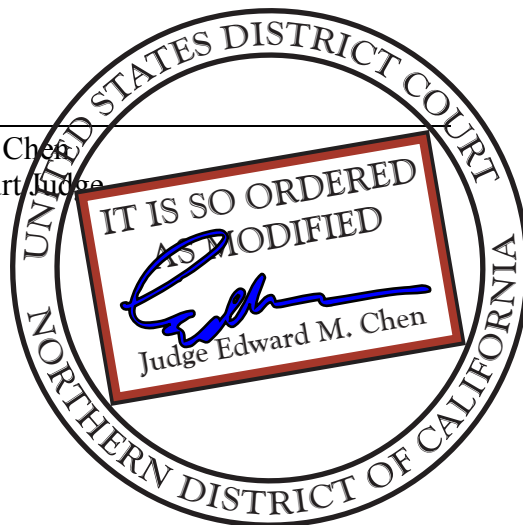
DATED: August 29, 2011

/s/ S. Ashlie Beringer
S. Ashlie Beringer

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Hon. Edward M. Chen
U.S. District Court Judge

101141539.1



DECLARATION OF SERVICE

I, Lorraine Nishiguchi, declare as follows:

I am employed in the County of Santa Clara, State of California; I am over the age of 18 years and am not a party to this action; my business address is 1881 Page Mill Road, Palo Alto, California 94304, in said County and State. On August 29, 2011, I served the within:

STIPULATION AND PROPOSED ORDER TO SET DEADLINE FOR FILING OF AMENDED COMPLAINT AND BRIEFING SCHEDULE AND HEARING FOR PROSPECTIVE MOTION TO DISMISS

to all named counsel of record as follows:



BY ECF (ELECTRONIC CASE FILING): I e-filed the above-detailed documents utilizing the United States District Court, Northern District of California's mandated ECF (Electronic Case Filing) service. Counsel of record are required by the Court to be registered e-filers, and as such are automatically e-served with a copy of the documents upon confirmation of e-filing.

I certify under penalty of perjury that the foregoing is true and correct, that the foregoing document(s) were printed on recycled paper, and that this Declaration of Service was executed by the undersigned on August 29, 2011, at Palo Alto, California.

/s/ Lorraine Nishiguchi

LORRAINE NISHIGUCHI